

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

IN RE: LOWER MANHATTAN DISASTER SITE
LITIGATION

-----X 07CV4462(AKH)
NANCY CRIOLLO LAWRENCE ZENTEINO,

Plaintiffs,

- against -

ANSWER TO
AMENDED
COMPLAINT

90 CHURCH STREET LIMITED PARTNERSHIP,
ALAN KASMAN DBA KASCO,
AMBIENT GROUP INC.,
AMERICAN EXPRESS BANK, LTD,
AMERICAN EXPRESS COMPANY,
AMERICAN EXPRESS TRAVEL RELATED SERVICES
COMPANY, INC., ANN TAYLOR STORES
CORPORATION, BANKERS TRUST COMPANY,
BATTERY PARK CITY AUTHORITY,
BELFOR USA GROUP INC.,
BFP ONE LIBERTY PLAZA CO., LLC BFP TOWER C CO. LLC.,
BFP TOWER C MM LLC., BLACKMON-
MOORING-STEAMATIC CATASTOPHE, INC. D/B/A BMS CAT,
BOARD OF EDUCATION OF THE CITY OF NEW YORK,
BOARD OF MANAGERS OF THE HUDSON VIEW EAST CONDOMINIUM,
BOSTON PROPERTIES INC.,
BROOKFIELD FINANCIAL PROPERTIES, INC.,
BROOKFIELD FINANCIAL PROPERTIES, LP BROOKFIELD
PARTNERS, LP, BROOKFIELD PROPERTIES CORPORATION,
BROOKFIELD PROPERTIES HOLDINGS INC., BT PRIVATE
CLIENTS CORP., DEPARTMENT OF BUSINESS SERVICES,
DEUTSCHE BANK TRUST COMPANY,
DEUTSCHE BANK TRUST COMPANY AMERICAS,
DEUTSCHE BANK TRUST CORPORATION, ENVIROTECH
CLEAN AIR, INC., GENERAL RE SERVICES CORP., GPS
ENVIRONMENTAL CONSULTANTS, INC., HILLMAN
ENVIRONMENTAL GROUP, LLC.,
HUDSON VIEW EAST CONDOMINIUM,
HUDSON VIEW TOWERS ASSOCIATES,
INDOOR ENVIRONMENTAL
TECHNOLOGY, INC.,
JONES LANG LASALLE AMERICAS INC,

JONES LANG LASALLE SERVICES INC,
KASCO RESTORATION SERVICES
CO., LEHMAN BROTHERS HOLDINGS INC.,
LEHMAN BROTHERS, INC., LEHMAN COMMERCIAL
PAPER, INC., MCCLIER CORPORATION, MERRILL LYNCH
& CO, INC., NATIONAL ASSOCIATION OF SECURITIES
DEALERS, INC., NEW LIBERTY PLAZA LP,
NEW YORK CITY INDUSTRIAL DEVELOPMENT AGENCY,
NEW YORK CITY INDUSTRIAL DEVELOPMENT
CORPORATION,
NEW YORK CITY SCHOOL CONSTRUCTION,
NOMURA HOLDING AMERICA, INC.,
NOMURA SECURITIES INTERNATIONAL INC.,
ONE LIBERTY PLAZA,
RY MANAGEMENT CO INC,
RY MANAGEMENT,
STRUCTURE TONE (UK), INC.,
STRUCTURE TONE GLOBAL SERVICES, INC., THE
BANK OF NEW YORK TRUST COMPANY NA, THE
BOARD OF MANAGERS OF THE ONE LIBERTY
PLAZA CONDOMINIUM (CONDO #1178), THE ONE
LIBERTY PLAZA CONDOMINIUM (CONDO #1178)
TISHMAN INTERIORS CORPORATION, TOSCORP
INC., TRAMMELL CROW COMPANY, TRAMMELL
CROW CORPORATE SERVICES, INC.,
TRIBECA LANDING LLC, TUCKER
ANTHONY, INC.,
TULLY CONSTRUCTION CO INC,
TULLY INDUSTRIES INC.,
VERIZON COMMUNICATIONS,
INC., VERIZON NEW YORK, INC, VERIZON
PROPERTIES, INC., WESTON SOLUTIONS, INC.,
WFP ONE LIBERTY PLAZA CO., L.P., WFP ONE
LIBERTY PLAZA, CO. GP, CORP., WFP RETAIL
CO. G.P. CORP., WFP RETAIL CO. L.P., WFP
TOWER A CO., WFP TOWER A CO. G.P. CORP.,
WFP TOWER A. CO., L.P., WFP TOWER B CO. G.P.
CORP., WFP TOWER B HOLDING CO., LP, WFP
TOWER B.,
WFP TOWER D CO GP CORP,
WFP TOWER D HOLDING CO I LP,
WFP TOWER D HOLDING CO II LP,
WFP TOWER D HOLDING I GP CORP,
WFP TOWER D CO LP and
WORLD FINANCIAL PROPERTIES LP,
ET AL

Defendants.

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PLEASE TAKE NOTICE that defendant Envirotech Clean Air Inc. ("Envirotech"), as and for their responses to the allegations set forth in the Amended Complaint by Adoption ("Check-off Complaint") related to the Master Complaint filed in the above-referenced action, hereby adopts Envirotech's Answer to the Master Complaint dated August 3, 2007, which was filed in the matter of *In re World Trade Center Lower Manhattan Disaster Site Litigation*, 21 MC 102 (AKH).

WHEREFORE, the defendant Envirotech demands judgment dismissing the above-captioned action as against each of them, together with costs and disbursements.

Dated: Lake Success, New York
March 7, 2008

Yours, etc.

FRIEDMAN, HARFENIST, LANGER & KRAUT
Attorneys for Defendant –Envirotech
3000 Marcus Avenue, Suite 2E1
Lake Success, New York 11042
(516) 775-5800

BY


Heather L. Smar (4622)